



Maureen Steele <maureensteelelawoffice@gmail.com>

Fwd: FFRF v. NKASD -- Pseudonyms and Protective Order

Marc Schneider <mschneider@steleschneider.com>

Thu, Dec 6, 2012 at 11:02 AM

To: Maureen Steele <msteele@steleschneider.com>

----- Forwarded message -----

From: **Marc Schneider** <mschneider@steleschneider.com>

Date: Mon, Oct 29, 2012 at 1:49 PM

Subject: FFRF v. NKASD -- Pseudonyms and Protective Order

To: Tony Sanchez <asanchez@andrewsandprice.com>

Tony,

Attached to this email you will find the current draft of the Motion for Leave to File Under Psuedonyms and for Protective Order that I intend to file in the above-referenced case. I am sending you this draft in hopes that you might consider (1) consenting to the Plaintiffs' request that they be permitted to proceed under pseudonyms, and/or (2) that you will consider consenting to the terms of the proposed Protective Order in the event that the Court grants Plaintiffs' request to proceed under pseudonyms.

Given the fact that there was been a great deal of (negative) public comment (which is referred to in the brief) and the fact that the case involves minor children as plaintiffs, we expect that the Court will permit the plaintiffs to proceed as "Doe" Plaintiffs. Further, I expect that it may also be easier for your client if the student-plaintiffs are not identified so that the District does not have to undertake efforts to ensure the safety of the student-plaintiffs.

Given these circumstances, I think it makes sense to explore whether there is any aspect of this motion that can be consented to. Attorney Vigilante had indicated his willingness to consent to the proposed terms of the protective order. I recognize that with your assumption of the role as NKASD counsel Tony's prior consent is unimportant, however I am hopeful that you will similarly consent to the terms of the proposed Order, if not the entire motion.

Please feel free to give me a call to discuss these or any other issues.

Regards,

Marc

—
STEELE SCHNEIDER

Marcus B. Schneider

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EXHIBIT A-Plaintiffs' Response to Defendant's Motion to Strike

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2 attachments



Memo in Support of Pseudonyms and Protective Order (DRAFT).pdf
220K



FFRF v. NKASD - Proposed Order Protective Order (DRAFT).pdf
82K